

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Frank Staples, et al., *
*
Plaintiff, *
v. * Civil No. 1:24-cv-00331-LM-TSM
*
Christopher Sununu, Governor, et al., *
*
Defendants. *
*

MOTION TO EXTEND RESPONSIVE PLEADING DEADLINE

Defendants, New Hampshire Governor Kelly Ayotte, New Hampshire former Governor Christopher Sununu, and the New Hampshire Attorney General, by and through counsel, the New Hampshire Office of the Attorney General, hereby move and states as follows:

1. On or around April 17, 2025, the Plaintiffs filed an Amended Complaint with Jury Demand with this Court (*See* ECF No. 48).
2. Plaintiffs' Amended Complaint is approximately fifty (50) pages long, consisting of over One Hundred Forty-Nine (149) paragraphs of factual allegations, legal arguments, and claims, many of which were not noticed in the initial Complaint. For reference, Plaintiffs' initial complaint was approximately ten (10) pages in length.
3. On information and belief, the Defendants deadline to file a responsive pleading to the Amended Complaint is currently set for Thursday, May 1, 2025.
4. The Defendants require additional time to compile a responsive pleading to said Amended Complaint and they seek an extension of their response deadline to June 16, 2025.
5. This requested extension is similar in length to the time period Plaintiffs took to file their Amended Complaint following Defendants' Motions to Dismiss, and the extension will

allow Defendants to address Plaintiffs' myriad claims in depth while balancing competing deadlines and preparing for a June 2025 jury trial in another matter.

6. Plaintiffs were contacted regarding the relief requested herein. Based on communications regarding the posture of this case and the within request, it is assumed the Plaintiffs object to this extension.

WHEREFORE, Defendants respectfully requests that this Honorable Court:

- A. Grant the within Motion;
- B. Extend the Defendants deadline to file a responsive pleading to June 16, 2025; and
- C. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

Kelly Ayotte, Governor
Christopher Sununu, former Governor
John Formella, Attorney General

By their attorney,

THE OFFICE OF THE ATTORNEY GENERAL

Dated: April 30, 2025

/s/ Shawna Bentley
Shawna Bentley, Bar #270149
Attorney
Civil Bureau
NH Department of Justice
1 Granite Place South
Concord, NH 03301
shawna.bentley@doj.nh.gov
(603) 271-6836

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via First Class Mail on April 30, 2025 to Plaintiffs' addresses as listed in the Complaint.

/s/ Shawna Bentley
Shawna Bentley